1 Chapter 7 Schweet Linde & Coulson, PLLC 2 575 S. Michigan St. **EX PARTE** 3 Seattle, WA 98108 P: (206) 275-1010 4 F: (206) 381-0101 5 6 IN THE UNITED STATES BANKRUPTCY COURT 7 8 In re 9 \*EX PARTE\* ANDREW L. TURNER, 10 Debtor. 11 12 13 COMES NOW, creditor Lakeland West Capital VIII, LLC ("Creditor"), and requests this 14 15 16 17 18 19 20 21 22 DATED this October 3, 2019. 23 24 /s/Michael M. Sperry 25

Honorable Judge Christopher M. Alston Location: Port Orchard/Bremerton

## WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Case No.: 19-12054-CMA

SECOND MOTION TO EXTEND DEADLINE TO FILE CHALLENGES TO DISCHARGE UNDER 11 U.S.C. §§523 AND 727 AS TO LAKELAND WEST

CAPITAL VIII, LLC ONLY

Court enter an order extending the deadline for Creditor to challenge the dischargeability of any obligation owed to it under 11 U.S.C. §523 by Andrew L. Turner ("Debtor"), and to extend the deadline to object to Debtor's discharge generally under 11 U.S.C. §727. This relief has been agreed to by Debtor, as evidenced by the signature of his attorney on the attached proposed order. Creditor has examined Debtor through a 2004 exam, and Creditor needs additional time to determine what, if any, causes of action may exist under 11 U.S.C. §§523 and/or 727. Debtor has agreed to extend the deadline to bring actions under 11 U.S.C. §§523 and/or 727 until October 17, 2019. This extension is only granted to Creditor, and is not applicable to any other party.

## SCHWEET LINDE & COULSON, PLLC

Michael M. Sperry, WSBA #43760 Attorneys for Creditor

MOTION TO EXTEND DEADLINE TO OBJECT TO DICHARGE OF DEBTOR - 1

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SCHWEET LINDE & COULSON, PLLC 575 S. MICHIGAN ST. SEATTLE, WA 98108 P(206) 275-1010 F(206) 381-0101

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